## REMARKS

Reconsideration of this application is respectfully requested.

Claims 1, 4-9, and 12-22 are pending. Claims 1, 4-9, and 12-22 stand rejected. No claims have been amended.

### Rejections Under 35 U.S.C. §102(e)

Claims 1, 4, 7-9, 12, 15-18, 21, and 22 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,937,598 of Hagirahim, et al. ("Hagirahim").

In independent claims 1, 9 and 17, applicants claim "an interworking unit to directly convert the voice data of the first format to voice data of the second format and to convert voice data of the second format to voice data of the first format."

Hagirahim discloses transporting ATM-based traffic via an IP-based backbone network. (Hagirahim, col. 1, lines 66-67). Hagirahim discloses:

> ATM signaling cells are initially received at a source gateway interconnected to the IP backbone network. At the source gateway, the ATM signaling message is converted to an intermediate message protocol and transmitted to a controller which provides a translation between the ATM address and an address of a destination gateway interconnected with the IP backbone which is operable to forward a received IP packet to an ATM network (or switch) serving that ATM address. The translated IP destination gateway address is then returned by the controller to the source gateway. ATM data cells of the same call as the original ATM signaling cell are thereupon encapsulated with IP headers which include the translated IP destination gateway address to form an IP packet which keeps the ATM cells intact within the packet. The IP packets are transferred onto the IP backbone network and routed to the addressed destination gateway where the IP packets are decapsulated to retrieve the original ATM data cells. The decapsulated ATM cells are then routed by the destination gateway to an ATM network (or switch) serving the destination ATM address.

(Hagirahim, col. 2, lines 6-25) (emphasis added). Thus, Hagirahim discloses translating an ATM signaling message and encapsulating ATM data cells with IP headers to form an IP packet. Hagirahim does not teach or suggest an interworking unit to directly convert the voice data of the first format to voice data of the second format and to convert voice data of the second format to voice data of the first format, as claimed.

The Examiner refers to Hagirahim's col. 5, lines 29-49 as teaching the claimed limitation.

In the cited portion, Hagirahim reads as follows:

> Referring to FIG. 5, there is shown a schematic block diagram of ATM bearer operation implemented in accordance with the invention. A call is established between two parties, for example, Party A 71 and Party B 81, by signaling messages exchanged between gateways via the IP backbone 11 in accordance with the previously described procedure. Once the call has been established, the gateways 21 will transmit IP packets 51, which include encapsulated ATM cells 41. ATM formatted cells of 53 bytes are completely enclosed within Transmission Control Protocol (TCP/IP) headers or User Datagram Protocol (UDP/IP) headers for transmission over the IP backbone 11. The IP header includes the translated ATM address received from the controller by the source gateway so that the packet is properly addressed with the IP address corresponding to the destination ATM address. Upon receiving an IP packet containing an ATM cell, the destination gateway will extract the ATM cell by means of decapsulating the IP header and transmitting the newly extracted ATM cell to the appropriate endpoint through the ATM network 61 serving the addressed party.

(Hagirahim, col. 5, lines 29-49) (emphasis added). Thus, Hagirahim discloses only that an IP packet that includes an ATM cell and an IP header containing a translated ATM address is formed. Hagirahim does not teach or suggest directly converting the voice data of the first format to voice data of the second format and to convert voice data of the second format to voice data of the first format, as claimed.

As such, Hagirahim does not anticipate claims 1, 9 and 17, and associated dependent claims 4, 7-8, 12, 15-16, 18, 21, and 22.

Rejections Under 35 U.S.C. §103(a)

Claims 5, 6, 13, 14, 19, and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Hagirahim and U.S. Patent No. 6,041,054 of Westberg.

As discussed, Hagirahim does not teach or suggest an interworking unit to directly convert the voice data of the first format to voice data of the second format and to convert voice data of the second format to voice data of the first format, as claimed. Applicants respectfully submit that Westberg does not supply the missing limitations. Westberg discloses employing ATM adaption layer two (AAL2) minicells as a bearer. (Westberg, Abstract). Westberg also is silent about and does not teach or suggest an interworking unit to directly convert the voice data

of the first format to voice data of the second format and to convert voice data of the second format to voice data of the first format, as claimed.

As neither Hagirahim nor Westberg teaches each and every limitation of independent claims 1, 9 and 17, applicants respectfully submit that associated dependent claims 5, 6, 13, 14, 19, and 20 are not rendered by the combination.

It is respectfully submitted that in view of the arguments set forth herein, the applicable rejections and objections have been overcome. If there are any additional charges, please charge Deposit Account No. 02-2666 for any fee deficiency that may be due.

Respectfully submitted,

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